

Hatfield & Dawson Consulting Engineers wishes to express its support for the Petition for Rulemaking filed by the National Translator Association, to provide for displacement relief for FM translators. The need for a minor change displacement procedure to non-adjacent channels is great, particularly now that FM translator major change applications can only be filed during a designated major change filing window. FM translators which are being displaced by a new or modified full-power FM station cannot afford to wait as much as a year or more for a major change window to occur, let alone the possible year-plus for processing of an application filed during the window.

The establishment of an FM translator minor change displacement procedure, such as is applied in the TV translator/LPTV service, would help to ensure that the valuable service provided by FM translators, particularly to rural areas, is not lost.